

9/9/2016

VIA ELECTRONIC FILING

Ms. Marlene Dortch
Secretary
Federal Communications Commission
The Portals
445 12th Street SW
Washington DC 20554

Re: Wireless Emergency Alerts – PS Docket # 15-91

Dear Ms. Dortch:

On September 8, 2016, Keith Kaczmarek, inPhase Wireless and Christopher Guttman-McCabe, CGM Advisors, LLC met with Admiral David Simpson, Bureau Chief in the Public Safety and Homeland Security Bureau, and James Wiley, Attorney Advisor, Policy and Licensing Division of the Public Safety and Homeland Security Bureau, to discuss the Commission's Wireless Emergency Alert (WEA) proceeding. In the meeting, the participants discussed the significant range of benefits that would flow to citizens and public safety alert originators from incorporating a device enhanced capability into WEA. Mr. Kaczmarek also discussed how the capability can be integrated into the WEA service while limiting impact on the mobile networks. The participants also discussed how a revenue opportunity could help offset the cost of WEA and drive additional investment and innovation into the wireless alerting service.

The discussion centered on a device enhanced WEA service and how incorporating the intelligence of the device into WEA will unlock a wide range of benefits to consumers while balancing the desire to limit impact on the mobile networks. Specifically, a device enhanced upgrade will:

- Increase participation in WEA, and usage of WEA, by public safety alert originators and likely increase participation by wireless carriers as well;
- Improve significantly geo-targeting and geo-fencing, allowing an alert message to be delivered in urban AND rural areas to a very focused alert area, thereby delivering very pertinent and very targeted information to the public while reducing the impact on the network;
- Create a cost offset and revenue opportunity for wireless carriers, as the enhanced geo-targeting will allow for the development of a range of paid offerings;
- Address accessibility issues by allowing WEA to connect to approved elements of the application layer of the device and incorporate accessibility solutions like text to speech, font increase, special tones, etc.;
- Provide opportunities to imbed emergency information (e.g., pre-developed information about moving to higher ground in a flash flood, below ground in a

- tornado, etc.) into the software so as to reduce the need for URLs and thereby limit impact on network;
- Deliver a level of certainty for alert originators, allowing them to have a strong sense of who will receive the message in spite of the differences in network deployments and network technologies;
 - Allow for geo targeting of alerts even when the network is compromised in the aftermath of an event;
 - Display the alert on a map, showing where the device exists in the alert area, thereby making the alert more personal to the consumer, and increasing the likelihood that they will act on the alert information; and,
 - Personalize the alert message, allowing for different languages if available, and different settings (font size, etc.).

If the WEA service can be upgraded to forward the alert coordinates from the wireless network to the mobile device, allow the device to utilize the coordinates to determine whether to render the alert on the device, and provide access to approved elements of the app layer (mapping, primary language choice, text to speech, etc.), the device can make the alert more personal and more actionable by displaying the alert and a map with the device's location, as well as incorporating the personal settings of the device including language of choice and accessibility solutions. This evolution would be significant for public safety and better educate our citizens in times of emergency.

If you have any questions, please feel free to contact me.

Sincerely,

/s/

Keith Kaczmarek